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*Attorneys for Defendants
Ashley Angus, Renee Baker, Tara Carpenter,
Paul Malay, and William Sandie*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRADLEY G. DRUMMOND,

Plaintiff,

v.

JAMES DZURENDA, *et al.*,

Defendants.

Case No. 3:18-cv-00152-MMD-WGC

**ORDER GRANTING
MOTION FOR EXTENSION OF
DISPOSITIVE MOTION DEADLINE TO
AUGUST 24, 2020**

Defendants, Ashley Angus, Renee Baker, Tara Carpenter, Paul Malay, and William Sandie, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Meredith N. Beresford, Deputy Attorney General, hereby files this Motion for Extension of Dispositive Motion Deadline to August 24, 2020. This motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request an extension of time to August 24, 2020 to file dispositive motions from the current deadline of August 12, 2020, set forth in the Minutes of the Court dated June 18, 2020 (ECF No. 44). Counsel for Defendants had a death in her immediate family last week and has been out of state with family. Counsel is requesting a short extension as portions of the dispositive motion have already been drafted. Further, this request has been necessitated by recent quarantine measures imposed in response to the COVID-19 virus pandemic. Namely, Governor Sisolak issued a

1 “stay at home” directive on April 1, 2020, whereby Deputy Attorneys General and other staff are
2 required to utilize home-based working arrangements. As a result, the already limited staff at the Office
3 of the Attorney General is rendered less efficient due to constraints imposed by limited Virtual Private
4 Networks (VPN) and lack of remote document access.

5 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:
6 When an act may or must be done within a specified time, the court may, for good cause, extend the
7 time: (A) with or without motion or notice if the court acts, or if a request is made, before the original
8 time or its extension expires; or (B) on motion made after the time has expired if the party failed to act
9 because of excusable neglect.

10 The requested extension of time should afford Defendants adequate time to prepare and file a
11 Motion for Summary Judgment in this case as well as engage in good faith settlement negotiations with
12 Plaintiff.

13 For these reasons, Defendants respectfully request a 12-day extension of time from the current
14 deadline to file a motion for summary judgment in this case, with a new deadline to and including
15 Monday, **August 24, 2020**. Likewise, Defendants respectfully request that the Court revise the deadline
16 for the joint pretrial order to be modified accordingly as set forth below.

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Schedule for Remaining Deadlines

Dispositive motion deadline **August 24, 2020**

Joint pretrial order (if no dispositive motions pending)* **September 24, 2020**

*Or 30 days after the decision of any pending dispositive motions.

DATED this 11th day of August, 2020.

AARON D. FORD

Attorney General

By: /s/ Meredith N. Beresford
MEREDITH N. BERESFORD, Bar No. 13308
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED

William G. Cobb
U.S. MAGISTRATE JUDGE

DATED: August 13, 2020